

June 22, 2021

VIA ELECTRONIC FILING

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC et al.*, No. 20-cv-3773 (LGS)

Dear Judge Schofield:

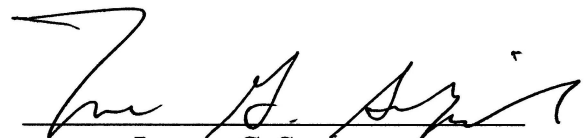
Pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020, Dkt. No. 51 (“Confidentiality Order”) (which incorporates the Court’s Individual Rule I(D)(3)), I write respectfully on behalf of Defendants to request that Defendants’ Answer and Counterclaims (the “Answer”) to Plaintiff’s Second Amended Complaint (Dkt. No. 98) be filed under seal. Defendants’ Answer references information produced in this case that Plaintiff has designated as Confidential Information or Discovery Material, as defined in the Confidentiality Order. Parties and attorneys of record who should have access to the sealed document are listed in Appendix A. Defendants will file a version of the Answer on the public docket, redacting references to Plaintiff’s Confidential Information or Discovery Material.

Pursuant to Paragraph I.D.3 of the Court’s Individual Rules, Defendants note that they are not the parties “with an interest in confidential treatment” of information contained in the Answer. Indiv. R. & P. ¶ I.D.3. Absent objection by Manbro, Defendants would not oppose filing the Answer on the public docket without redactions.

Respectfully, Defendants' request to seal their Answer and Counterclaims to Plaintiff's second Amended Complaint is DENIED. Plaintiff does not object to filing the Answer on the public docket without redactions (Dkt. No. 109).
/s/ Mark A. Kirsch

Mark A. Kirsch The Clerk of Court is respectfully directed to terminate the motion at Dkt. No. 104 and to unseal the Answer at Dkt. No. 107.

Dated: July 2, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

Gibson, Dunn & Crutcher LLP

Randy M. Mastro

Mark A. Kirsch

Avi Weitzman

Casey Kyung-Se Lee

Cleary Gottlieb Steen & Hamilton LLP

Joon H. Kim

Victor L. Hou

Rahul Mukhi

Mark E. McDonald